

DECLARATION OF JOSEPH B. WIDMAN

I, Joseph B. Widman, declare as follows:

A. Introduction

1. I am a former Assistant United States Attorney ("AUSA") in the United States Attorney's Office for the Central District of California ("USAO"). I joined the USAO in 2007, was promoted to deputy chief of the Riverside Branch Office in June 2012, was promoted to chief of the Riverside Branch Office in January 2014, and left the USAO in September 2020. This declaration does not purport to set forth all of my knowledge of or investigation into United States v. Julio Cesar Ramirez, ED CR 11-051-VAP (the "Ramirez case"), or United States v. John Jacob Olivas, ED CR 18-231-JGB (the "Olivas case"). I write this declaration based primarily on my memory and a few documents shown to me by the prosecutors currently assigned to the Olivas case. I have not reviewed my contemporaneous USAO emails from the periods in question. If called to do so, I would and could competently testify to the matters contained herein.

B. The Ramirez Case

2. I was the AUSA who investigated, charged, and resolved through guilty plea and sentencing the prosecution titled United States v. Julio Cesar Ramirez, ED CR 11-051-VAP.

3. As part of my investigation into misconduct allegations against various law enforcement officers and confidential informants involved in the Ramirez case, my memory is that I interviewed Olivas in or about December 2012 regarding the allegations made about him in the Ramirez case. I find it implausible that I would have asked Olivas about his relationship history beyond what was alleged about him in the Ramirez case, although I have very little independent

1 recollection of this/these conversation(s). I never had any personal
2 relationship with Olivas; my relationship with him was strictly
3 professional.

4 4. I do not recall talking about the Ramirez case with AUSAs
5 Eli Alcaraz, Julius Nam, or Frances Lewis at any point before my
6 discussion of this declaration with AUSA Alcaraz.

7 **C. The Olivas Case**

8 5. I recall that the FBI first approached then-AUSA Jay
9 Robinson regarding a civil rights investigation of Olivas sometime in
10 2014. At that time, AUSA Robinson was an AUSA and deputy chief of
11 the Riverside Branch Office.

12 6. Sometime in 2016, after AUSA Robinson had been transferred
13 to the USAO's National Security Division following the December 2,
14 2015 terrorist attack in San Bernardino, at the direction of USAO
15 management, most of AUSA Robinson's Riverside Branch matters were
16 reassigned to colleagues in Los Angeles or given to me to reassign
17 within the Riverside Branch. The Olivas investigation was one of the
18 matters I became responsible for as chief of the Riverside Branch.
19 This is consistent with a document I have seen showing that I
20 received some Olivas-related materials from FBI Special Agent David
21 Staab in August 2016.

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